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U.S. Department of Justice

United States Attorney
Eastern District of Missouri

Thomas Eagleton U.S. Courthouse OFFICE: 314-539-2200
111 S. 10th Street, Rm. 20.333 FAX: 314-539-2309
St. Louis, MO 63102

February 4, 2019

Daniel Juengel
Attorney
7710 Carondelet Ave
Clayton, MO 63105

RE: United States v. ASHU JOSHI
Cause Number: 4:18:CR0876 JAR

Dear Mr. JUENGEL:

As you are aware, your client was indicted by the Federal Grand Jury. The Government has either turned over or made available to you all pre-trial discovery in its' position. Specifically, the government has turned over to the defense on **October 30, 2018**:

1. Facebook Cyber Tip #41222737 on a CD (this was also given in paper form)
2. Audio Recordings of the victim's statement and the mother's statement on a CD
3. Video statement of Ashu Joshi on CD
4. Police Reports from Bowling Green, KY PD (18 pages total including towneplace suites hotel receipt from the Bowling Green Police) on a CD
5. St. Louis County Police Report (22 pages) on a CD
6. Audio taped statement of Natalie Hayes
7. Search warrant photos on a CD
8. Consent to search forms on a CD
9. Photos taken by Police in Kentucky of Marriott hotel on a CD
10. Audio recorded phone interview between Bowling Green PD and Victim's Mother on CD
11. Facebook SW for both MD and Defendant's accounts
12. Southwest Airlines Email cancelling flight
13. Passport Application
14. Three Fairfield Inn Hotel Receipts
15. Emails dated 8/23, July 6, 2018, July 24, August 7, 2018, August 23, 2018, October 6, 2018 Country Inn Hotel Receipt from email account
16. Twitter Account photo – defendant.



Then the government turned over to the defense on **November 20, 2018**:

17. CD with Bank Records
18. CD with exported facebook messages from the victim's facebook account*

The government turned over the following report via email on **January 9, 2019**:

1. St. Louis County Digital Evidence Report – a report containing relevant text messages between the victim, the defendant, and her mother.

Available at my office for you to review in full since **November 20, 2018**:

1. Victim's Facebook records
2. Facebook Cyber Tips to NCMEC

Available at my office for you to review in full since **January 3, 2019**:

1. Defendant's Facebook records in Full. These are long and embedded with images of child pornography so they cannot be turned over and must be viewed at my office.
2. Full dump of the defendant's cell phone.

As you are probably aware, I will be out of the office for approximately ten to twelve weeks beginning March 18, 2019. However, you can still view the evidence by contacting the case agent, Donya Jackson at 314-539-2200.

If you wish to view the child pornography evidence or Facebook evidence, which does contain additional statements of your client, please contact me or Investigator Jackson and we will arrange a mutually-agreeable time for you to examine the evidence in our office.

I thank you in advance for your anticipated cooperation.

Very truly yours,

JEFFREY B. JENSEN
United States Attorney

/s/Colleen C. Lang
Colleen C. Lang
Assistant United States Attorney